NORTHWEST PIPELINE
Environmental Services
295 Chipeta Way, 3rd Floor
Salt Lake City, UT 84108-1220

January 15, 2019

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 North Orchard
Boise, ID 83706

Re: Annual Compliance Certification Report for the Boise Compressor Station for Permit No. T1-2016.0019 from January 1, 2018 through December 31, 2018

To Whom It May Concern:

In accordance with the Boise air permit No. T1-2016.0019 Northwest Pipeline (Northwest) submits the attached annual compliance certification report for January 1, 2018 through December 31, 2018. Please note that this report also covers the semi-annual compliance reporting period. The director of operations, Pete Richards, has signed and dated the report.

Also, in accordance with New Source Performance Standards (NSPS) Subpart OOOOa, Northwest, submits the attached annual report for the two controllers at the Boise Compressor Station..

An additional copy of this report is also being sent to:

EPA Region 10
Air Operating Permits, OAQ-107
1200 Sixth Avenue
Seattle, WA 98101

If you have any questions or concerns, please feel free to contact me at (801) 584-6748.

Sincerely,

Derek Forsberg
Environmental Specialist

CC: File – Boise Air

112804

Idaho Department of Environmental Quality
Air Quality Division
Stationary Source Program

TIER I ANNUAL COMPLIANCE CERTIFICATION

FORM AQ-C1

FACILITY INFORMATION

Facility/Permittee Name: Boise Compressor Station/Northwest Pipeline
Co-Permittee Name(s):
Facility Location: Boise, ID
AIRS Facility No.: 001-00094
Facility Contact: Derek Forsberg **Ph:** 801-584-6748 **Fax:** 801-584-6344

PERMIT AND COMPLIANCE INFORMATION

Tier I Operating Permit No.: T1-2016.0019 **Issuance Date:** August 31, 2016
Tier I Operating Permit No.: **Issuance Date:**
Compliance Reporting Period: From: 1/1/2018 To: 12/31/2018
Is This Intended To Be A Semiannual Report Also? ☒ Yes ☐ No
Deviations Reported This Period? ☐ Yes ☒ No

List of Attachments:
☒ Annual Compliance Certification Table (Form AQ-C2) No. of Pages: 5
☐ Semiannual Deviation Summary Table (Form AQ-C3) No. of Pages:
☐ Other: No. of Pages:
No. of Pages:
No. of Pages:
No. of Pages:
No. of Pages:
No. of Pages:

Certification of Truth, Accuracy, and Completeness (by Responsible Official)
I hereby certify that based on information and belief formed after reasonable inquiry, the statements and information contained in this and any attached and/or referenced document(s) are true, accurate, and complete in accordance with IDAPA 58.01.01.123-124.

Responsible Official Signature | Director of Operations *Responsible Official Title* | JAN. 17, 2019 *Date*

Pete Richards
Print or Type Responsible Official Name

Co-Permittee Responsible Official Signature | *Co-Permittee Responsible Official Title* | *Date*

Print or Type Co-Permittee Responsible Official Name

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

Facility/Permittee Name: Boise Compressor Station/Northwest Pipeline
Facility Location: Boise, ID
AIRS Facility No.: 001-00094

Tier I Operating Permit No.: T1-2016.0029
Issuance Date: August 31, 2016
Compliance Reporting Period: 1/1/2018 – 12/31/2018

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C[1], I[2], or N/A[3]	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C[1] / I[2]	Attachments
1.1	None Required	I	None	C	
1.2	None Required	I	None	C	
1.3	None Required	I	None	C	
1.4	None Required	I	None	C	
2.1	Permit conditions 2.2-2.4	I	None	C	
3.1	Permit condition 3.2	I	None	C	
3.2	Gravel roads well maintained and gravel re-applied when necessary.	I	None	C	
3.3	No complaints received this period. Log maintained at facility, available upon request.	I	None	C	
3.4	Inspections conducted quarterly. No fugitive emissions noted during this reporting period. Log maintained at facility, available upon request.	I	None	C	
3.5	Permit condition 3.6	I	None	C	
3.6	No complaints received this period. Log maintained at facility, available upon request.	I	None	C	
3.7	No visible emissions observed	I	None	C	
3.8	No visible emissions observed	I	None	C	
3.9	No excess emissions events to report during this reporting period.	C	None	C	
3.10	No excess emissions events to report during this reporting period.	C	None	C	
3.11	No excess emissions events to report during this reporting period.	C	None	C	

[1] C = Continuous [2] I = Intermittent [3] N/A = Not Applicable

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C[1], I[2], or N/A[3]	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C[1] / I[2]	Attachment
3.12	No excess emissions events to report during this reporting period.	C	None	C	
3.13	No excess emissions events to report during this reporting period.	C	None	C	
3.14	No excess emissions events to report during this reporting period.	C	None	C	
3.15	Testing is performed pursuant to these conditions.	I	None	C	
3.16	Records maintained at facility and in office.	I	None	C	
3.17	All reports and certifications required by this permit have been submitted according to the conditions of the permit.	I	None	C	
3.18	No open burning conducted at the facility.	C	None	C	
3.19	No renovation or demolition has been conducted at the facility.	C	None	C	
3.20	Not applicable	N/A	None	C	
3.21	Only licensed contractors handle refrigerant at NWP facilities.	I	None	C	
3.22	Emissions testing is performed as per permit requirements.	N/A	None	C	
3.23	Proper maintenance and record keeping are conducted per permit requirements..	N/A	None	C	
3.24	None required	N/A	None	C	
4.1	Permit Condition 3.14	I	None	C	
4.2	Permit Condition 3.14	I	None	C	
4.3	Permit Condition 3.14	I	None	C	
4.4	Permit Condition 3.14	I	None	C	
4.5	Permit Condition 3.14	I	None	C	
4.6	Permit Condition 3.14	I	None	C	

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TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C[1], I[2], or N/A[3]	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C[1] / I[2]	Attachment
43.7	Permit Condition 3.14	I	None	C	
4.8	None required	I	None	C	
4.9	Turbines have fired natural gas exclusively	I	None	C	
4.10	No fuel containing sulfur in excess of 0.8% by weight has been burned	C	None	C	
4.11	Records maintained at facility.	I	None	C	
4.12	Performance tests will be completed in a timely manner.	I	None	C	
4.13	No fuel containing sulfur in excess of 0.8% by weight has been burned.	I	None	I	
4.14	Calculations performed monthly to demonstrate compliance.	I	None	C	
5.1	The applicable requirements of Subpart ZZZZ are being met.	I	None	C	
5.2	The generator is operated and maintained to minimize emissions.	I	None	C	
5.3	Subpart ZZZZ operation and monitoring requirements are being met.	I	None	C	
5.4	Subpart ZZZZ operation limitations are followed.	I	None	C	
5.5	Subpart ZZZZ records are kept.	I	None	C	
5.6	Subpart ZZZZ requirements are followed.	I	None	C	
6.1	None Required	I	None	C	
7.1	None Required	I	None	C	
7.2	None Required	I	None	C	
7.3	None Required	I	None	C	
7.4	None Required	I	None	C	

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TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C[1], I[2], or N/A[3]	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C[1] / I[2]	Attachment
7.5	None Required	I	None	C	
7.6	None Required	I	None	C	
7.7	None Required	I	None	C	
7.8	None Required	I	None	C	
7.9	None Required	I	None	C	
7.10	None Required	I	None	C	
7.11	None Required	I	None	C	
7.12	None Required	I	None	C	
7.13	None Required	I	None	C	
7.14	None Required	I	None	C	
7.15	None Required	I	None	C	
7.16	None Required	I	None	C	
7.17	None Required	I	None	C	
7.18	None Required	I	None	C	
7.19	None Required	I	None	C	
7.20	None Required	I	None	C	
7.21	None Required	I	None	C	
7.22	None Required	I	None	C	
7.23	None Required	I	None	C	

[1] C = Continuous [2] I = Intermittent [3] N/A = Not Applicable

TIER I ANNUAL COMPLIANCE CERTIFICATION TABLE

FORM AQ-C2

1 Permit Condition	2 Compliance Determination Methods	3 Monitoring Frequency C[1], I[2], or N/A[3]	4 Deviations and Excess Emission Events	5 Permit Condition Compliance Status C[1] / I[2]	Attachment
7.24	None Required	I	None	C	
7.25	None Required	I	None	C	
7.26	None Required	I	None	C	
7.27	None Required	I	None	C	
7.28	None Required	I	None	C	
7.29	None Required	I	None	C	

[1] C = Continuous [2] I = Intermittent [3] N/A = Not Applicable

Northwest Pipeline
Boise Compressor Station
28001 South Orchard Lane
Boise, ID 83716

40 CFR Part 60 Subpart OOOOa
Pneumatic Controller Standards
Annual Report
Report Date: January 15, 2019

Reporting Period – January 1, 2018 through December 31, 2018

Reporting Requirements:

40 CFR 60.5320(b)(5)(i)

An identification of each pneumatic controller constructed, modified or reconstructed during the reporting period, including the identification information specified in §60.5390(b)(2) or (c)(2)

Two GE Masoneilan digital valve controllers, Serial # C215110657 and C315384613, were installed at the Boise Compressor Station in July 2016 to operate control valves. The controllers are tagged with the month/year of installation and the serial # of the controller.

40 CFR 60.5320(b)(5)(ii)

If applicable, documentation that the use of pneumatic controller affected facilities with a natural gas bleed rate greater than 6 standard cubic feet per hour are required and the reasons why.

A memo to file containing information pertaining to the use of a pneumatic controller affected facility with a natural gas bleed rate greater than 6 standard cubic feet per hour and the reasons why is attached to this report.

40 CFR 60.5320(b)(5)(iii)

Records of deviations specified in paragraph (c)(4)(v) of this section that occurred during the reporting period.

No deviations occurred during this reporting period.

NORTHWEST PIPELINE LLC

MEMORANDUM

DATE:	NOVEMBER 1, 2016		
TO:	FILE	**FROM:**	DEREK FORSBERG
DEPARTMENT:	ENVIRONMENTAL SERVICES	DEPARTMENT:	ENVIRONMENTAL SERVICES

SUBJECT: NSPS OOOOa subject Pneumatic controller

This memo documents applicability of New Source Performance Standards 40 CFR Part 60 Subpart OOOOa- Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015 (Subpart OOOOa) to the Boise compressor station. Subpart OOOOa establishes emissions standards and compliance schedules for the control of the greenhouse gases (GHG), volatile organic compounds (VOC) and sulfur dioxide (SO2) from affected facilities in the crude oil and natural gas source category that commence construction, modification or reconstruction after September 18, 2015.

Northwest Pipeline LLC (Northwest) operates a high pressure, natural gas transmission pipeline which transports pipeline quality natural gas from processing facilities to end users. Compressor stations located along the pipeline operate to boost gas pressure in the pipeline. The Boise compressor station provides compression using centrifugal compressors. The Boise compressor station recently completed an upgrade of the controls system. As part of the changes, new affected pneumatic controllers were installed at the facility.

Masoneilan valve controllers, Serial #'s C215110657 and C315384613 were installed at the Boise compressor station in July 2016 to operate control/surge valves. The controllers utilize a low flow relay. The control valve works to accommodate gas flow changes at the compressor station, bringing meter runs online/offline as conditions necessitate. Since instrument air is unavailable at the facility, the controller is operated using pipeline quality natural gas with a supply pressure of 80 psi. The steady state natural gas consumption rate of the controller is 8.94 scfh and is therefore considered a continuous, high bleed pneumatic controller as defined in 40 CFR 60 Subpart 60.5430a. Use of a high bleed pneumatic controller was necessary due to the functional need for rapid response time and positive actuation of the control valve. Northwest installed a controller model with the lowest gas consumption rate that could still meet operational needs of the control valve.

The high bleed pneumatic controller is tagged with the month/year of installation and serial number to allow record traceability in accordance with §60.5390a(c)(2). In accordance with §60.5420(c)(4)(ii) this memo documents the functional need for use of a high bleed pneumatic controller.